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Montana Pole
superfund site
community
relations plan

MONTANA POLE SUPERFUND SITE

COMMUNITY RELATIONS PLAN

Montana Department of Health and
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MONTANA POLE

SUPERFUND SITE

COMMUNITY RELATIONS PLAN

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By

Montana Department of Health and Environmental Sciences

Solid and Hazardous Waste Bureau

Room B201, Cogswell Building

Helena, MT 59620

Sept. 1989

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This community relations assessment report identifies issues of community concern regarding the Montana Pole Superfund site in Butte, Montana, and outlines community relations activities to be conducted during the remedial investigation and feasibility study (RI/FS) of the site. This plan was prepared in accordance with guidance found in Community Relations in Superfund: A Handbook, Interim Version, Office of Emergency and Remedial Response, U.S. EPA, March 1988. The Handbook spells out the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and as stipulated in the rules that interpret the Superfund legislation, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The purpose of the community relations plan is to identify the concerns of people affected by the site, and develop methods to address those concerns. The U.S. Environmental Protection Agency (EPA) guidance requires that the lead agency for community relations conduct community interviews, and based on these interviews, prepare a community relations plan that includes a description of the site background, history of community involvement at the site (including major community concerns), community relations strategies, a schedule of community relations activities, and a list of affected and interested groups and individuals. The interviews form the foundation for developing the appropriate information to be disseminated to the public, and for determining what actions are necessary to deal with public concerns. The Handbook states that "a community relations program should not try to quell controversy, but rather strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views."

It is important to emphasize that the community relations plan presents the opinions and concerns of residents and other interviewees and not those of the Montana Department of Health and Environmental Sciences, EPA, or the potentially responsible parties (PRPs). The information developed in these interviews and summarized in the community relations plan reflects interviewees' responses, whether or not those responses are factually precise or accurately portray conditions at the site. The community relations plan serves as a basis for addressing community concerns and also for clarifying

misinformation identified in community responses. The plan suggests measures for accomplishing both of these objectives.

This community relations plan is designed to direct community relations activities for Montana Department of Health and Environmental Sciences (MDHES) and the U.S. Environmental Protection Agency (EPA) during remedial investigation/feasibility study activities at the Montana Pole Superfund site in Butte, Montana. MDHES has lead responsibility for site management and community relations activities.

Information for this plan was gathered from on-site interviews conducted by MDHES. Interviewees included local government officials, members of the press, area residents, business people, and legislators. The interviews were informal. MDHES asked interviewees about their understanding of the site, their attitudes toward Superfund, and general questions about the community of Butte.

SITE BACKGROUND

The Montana Pole Superfund site is the location of a former wood treating facility which operated from 1946 to 1984. During most of the period of operation, Montana Pole used pentachlorophenol (PCP) in a mixture with diesel to preserve wood. Montana Pole was added to the National Priority List of Superfund sites in November 1986. It is adjacent to the Silver Bow Creek Superfund site and is one of the four sites that make up the Clark Fork Basin group of Superfund sites. Contamination at the other sites in the Basin is primarily made up of mining and smelting wastes from more than 100 years of mining in the area.

Samples of tank liquid, sludges, soil, surface water and groundwater were collected by MDHES in 1984-85, revealing concentrations of PCP up to 19,000 parts per million (ppm). Dioxin also has been detected in soil and oil samples. PCP and dioxin are probable human carcinogens. MDHES and EPA completed the Preliminary Assessment and Site Investigation which resulted in a Hazard Ranking Score in July 1985. The EPA Emergency Response Branch began

conducting a Removal Action at the Montana Pole site in July 1985 to alleviate seepage into Silver Bow Creek, to collect oil and contaminants from groundwater, to excavate and store highly contaminated soils, and to generally stabilize the site.

Investigation and cleanup activities by the EPA Emergency Response Branch at the Montana Pole site have included the following:

1985:

-- Siphon dam and boom installation immediately downstream of seepage areas along Silver Bow Creek.

-- Construction of collection and infiltration trenches to prevent groundwater contamination from reaching Silver Bow Creek.

-- Recovery of oil product in trenches using a mop skimmer from July to September 1985, followed by backfilling of trenches.

-- Construction of 17 monitoring wells in vicinity of site and subsequent sampling of groundwater and oil.

1986:

-- Creek trench torn out and replaced with improved pump system.

-- Construction of additional infiltration gallery in north system.

-- Five steel buildings constructed on-site to contain approximately 10,000 cubic yards of contaminated soil removed and bagged from around the facility and the surface drainage.

-- Approximately 26 tanks and two pressure retorts cut and stored on-site in the sawmill. Sludge held in the tanks solidified and bagged with the soil.

-- Liquid detoxification to remove dioxin from 9,000 gallons of contaminated liquid from site. Waste oil and approximately 40 drums of sludge are held on-site.

1987:

-- Analysis of water being discharged to infiltration galleries.

Results show up to 24 ppm dissolved PCP, metals in the ppm range, and elevated dissolved hydrocarbon fractions.

-- Installation of eight additional monitoring wells on north half of site.

-- Detailed investigation to determine location, extent and volume of product remaining to discharge into Silver Bow creek.

In October 1988, MDHES assumed responsibility for the operation and maintenance of the existing recovery and infiltration system to prevent product movement into Silver Bow Creek. Oil separators are used to recover oil product from pumped groundwater prior to discharge into infiltration galleries. The oil product is stored on-site in above-ground tanks. One tank failed and was replaced in January 1988.

In April 1988, the State of Montana and EPA signed a cooperative agreement for the state to take lead responsibility for the Remedial Investigation/Feasibility Study process at the site. Community relations will also be state-lead and will be conducted by the MDHES Superfund public information officer.

SITE HISTORY

Torger L. Oaas began construction of the pole treating plant in July 1946 in a previously undeveloped area, now known as the Montana Pole and Treatment Plant site near Butte. Pole treatment operations began when the first shipment of product was made in April 1947. A full line of wood products were treated at the plant, including utility power and transmission poles, bridge foundation pilings, planking, ties, timbers, and fence and guard rail posts.

Oaas entered into a 10-year lease for the property with Anaconda Company in 1946 and bought the land in 1955. In 1954, Oass bought additional land to the east of the original site from Silver Bow County so the operation could expand. A parcel of land north of the original site was leased from

Anaconda Company in 1956 for further expansion; this parcel was subsequently sold to the State of Montana and is now part of U.S. Interstate 90. Because the highway construction halted the growth of the company to the north, an additional parcel of land was purchased from Anaconda Company in 1958, expanding the site to the west.

During initial construction of the plant, Oass installed a pole peeling machine, two butt treating vats, a boiler and other related equipment. The operation at this time, which used only a butt-treating process, employed five to six workers.

In August of 1951, Oass installed a retort to pressure-treat the wood, thus enhancing the quality of the treatment. Oass added a second retort in 1958.

On May 5, 1969, there was a fire at Montana Pole. A watchman reported creosote (a wood preservative used at the plant for a short period of time) burning on the ground. The fire, fueled by both creosote and treated lumber spread through buildings and seared a storage tank containing an estimated 10,000 gallons of heavy fuel oil, causing it to rupture and burst into flames. Before the fire was brought under control, much of the wood treatment equipment was severely damaged and several buildings were destroyed, along with a large quantity of lumber. It is unknown how much PCP and creosote were released in the fire; there was spillage from a butt-treating vat and both retorts.

Oass rebuilt the plant and had it back in operation by December that year. The remodelled facility did not use the butt-treatment process again after the fire. After the plant was back in operation, only PCP was used to treat the lumber.

By 1974, Montana Pole, including its logging operation, operated with approximately 25 employees in the slack season and 40 employees at peak operations during summer months. The company cut approximately 3.4 million board feet of lumber per year, most of which was taken from U.S. Forest Service lands. By this time, Montana Pole, reportedly had used approximately 500,000 gallons of PCP and petroleum to treat lumber.

In 1976, Montana Pole acquired new wood peeling equipment to virtually double the peeling capacity at the plant. In 1978, Oass invested in a sawmill was put into operation in 1980.

In 1980, Montana Pole implemented a completely closed process water system on the site to eliminate the drainage of waste process water. The new process involved recycling of process water and the excess was evaporated using aeration sprays.

In March 1983, a private citizen complained about oil seeping into Silver Bow Creek. The Montana Pole facility is located approximately 200 yards south and upgradient from Silver Bow Creek. MDHES investigated the complaint and discovered an oil seep on the south side of Silver Bow Creek. A portion of the creek's bank was saturated with oil. An investigation of the area revealed the Montana Pole facility had discharged waste fluids from the pole treatment operation to a ditch adjacent to the plant. Oil staining was obvious on the upper portion of the ditch but decreased in the lower portion. On March 7, 1983, MDHES personnel observed and collected samples of a petroleum product discharging into Silver Bow Creek directly downgradient from the Montana Pole facility. Laboratory analyses of the samples revealed the presence of PCP in concentrations in excess of 22 ppm.

On July 27, 1983, MDHES took groundwater samples from monitoring wells located downgradient from Montana Pole near Silver Bow Creek. The analysis showed PCP greater than 19.8 ppm.

During this time, wood treatment operations continued at the facility. The company became more highly leveraged in order to finance the building of the sawmill in the late 1970s. Subsequently, high interest rates and a weak lumber market caused severe cash flow shortages. There were significant efforts to sell the company in 1983, but no sale could be made. Business at Montana Pole ceased in 1984 because of continued financial loss.

On May 7, 1984, MDHES issued Montana Pole a Notice of Violation and Order to take Corrective Action. The Order cited contamination of soils, groundwater and surface water with hazardous wastes, and required submission of a compliance plan to achieve cleanup of the site. In June 1984, Montana Pole informed MDHES they had turned over all their property to Miners Bank of Montana and would be unable to comply with the Order.

Later that month, Miners Bank of Montana notified MDHES of their intent to auction the property and equipment from the facility. The District Court denied an injunction by the State of Montana against the auction, but ordered that Miners Bank of Montana take certain precautions to assure that

purchasers at the auction were aware of potential hazardous waste problems with the equipment being sold. The auction was held June 19, 1984, and brought in $200,000.

On Nov. 17, 1986, Oass filed suit for damages against I.F. Laucks and Company, Monsanto Chemical Company, Reichold Chemicals, Inc., Dow Chemical Co., Chapman Chemical Co., and 50 unnamed companies. The $10 million suit alleges the defendants acted with negligence toward the plaintiffs in allowing an extremely dangerous product, PCP, to be used by members of the general public without adequate warning. The outcome of the suit is still pending.

COMMUNITY PROFILE

From the early 1870s to the late 1970s, Butte had the reputation of being one of the world's most productive mining districts because of rich copper deposits under the city and surrounding area. The Butte Hill has been called "the richest hill on earth," and at one time the Berkeley Pit, at the edge of Butte, was the largest open pit truck mine in the world. In addition to the open mines, it is estimated that there are approximately 4,500 miles of mining tunnels under the city.

From the late 1800s to the early 1900s, seventeen active smelters and more than 100 different mines operated in the area. After the Anaconda Smelter was constructed in 1917, all smelting took place in Anaconda. The builder of this smelter, Anaconda Company, eventually emerged as the major employer in the area and a major mining company in the country.

Butte was a large town during the height of mining activity at the turn of the century with a population of approximately 150,000 at one point. This large population was comprised of many nationalities, but most notably Irish, Italian, and Chinese. Local newspapers of the day reported frequent crimes often involving partners in mining operations.

By the middle of the 1900s, Butte settled into a town dependent on mining and on one main employer, the Anaconda Company. Digging of the Berkeley Pit began in the section of town once known as Meaderville. The pit was in

operation until 1981 when all mining was shut down, putting approximately 2,500 people out of work. Butte then began an economic decline from which it has not yet totally recovered. However, a strong coalition of local government officials and business people are working to restore Butte's economy with an active push to revitalize the downtown district. In 1987, the High Altitude Training Center was constructed in Butte to provide Olympic athletes and hopefuls from around the world with a place to train in high altitude conditions. The local government in Butte is also working actively to revegetate and revitalize many of the old mining areas.

OVERVIEW OF COMMUNITY RELATIONS AT THE MONTANA POLE SITE

EPA's Emergency Response Branch conducted community relations at the Montana Pole site during the removal phase of activities. A community relations plan was approved in September 1985. Numerous press releases were sent to the media during milestones in the process. The on-site coordinator was available to talk to the press and answer questions from the public. During this time, however, the public did not show a great deal of interest in site activities.

SUMMARY OF CONCERNS AND ISSUES

Interviewees voiced few concerns and showed little awareness of the Montana Pole site. This lack of concern and awareness may be due, at least in part to several factors:

- It is a small site
- It is no longer in operation and presents few labor concerns
- Its size and problems may appear small to the public, compared to the other Superfund sites in the Clark Fork Basin
- There are no residential areas immediately adjacent to the site
- There has been little Superfund activity at the site in the recent past.

However, because the site is adjacent to the Butte Addition of the Silver Bow Creek site, most had strong opinions about Superfund in general.

Overall, the major issues in Butte revolve around the economy and jobs, and how Superfund activities affect those. Economic issues tend to outweigh environmental issues. Many of the older people in Butte question MDHES's and EPA's concerns about health issues, saying they lived through the contamination and are still in good health. Following is a list of the issues raised:

1. The economy

Many people in Butte are still unemployed after the shutdown of Berkeley Pit mining operations. Although Montana Resources Incorporated, a Missoula-owned firm, has recently begun mining operations, it only employs about 350 people. Many workers who were laid off in 1981 have left the Butte area. Most people in Butte no longer believe that ARCO, who bought Anaconda Company in 1978, will come back and re-open operations but many still hope to see mining become active again. There is the possibility that a smelter will be built in Butte. When asked if the Montana Pole Plant were still in operation, would the people see Superfund activities there a threat to the plant, most said yes and they would oppose cleanup activities.

Many people interviewed said Superfund site designation is detrimental to the economy of Butte.

2. Slowness of Superfund Activities

Although not directly associated with the Montana Pole site, flooding in the Berkeley Pit is a big issue in Butte which has implications for other sites. In 1982, ARCO shut off pumps which drew groundwater from the mines. After the pumps were shut off, mines began to fill with water. Much of that water is draining into the Berkeley Pit, causing it to fill with dark brown, acidic water. People in Butte often express fear that the Pit will fill and overflow, causing flooding of the town before Superfund is able to find a solution to the problem. Interviewees expressed frustration that there is too much study and not enough cleanup. During on-site interviews, several people expressed concerns that activities at the Montana Pole site will also be slow and the site will never really be cleaned up.

3. Attitudes toward government

Interviewees often said the people of Butte are highly distrustful of the federal government. Most Butte residents would prefer to work with state government and even more prefer to work with local government. Interviewees suggested that federal employees, and to a lesser extent, State employees, are too far removed from issues in Butte to have a good understanding of issues. Another interviewee said Butte residents see the EPA taking too soft an approach toward responsible parties and site cleanup. The fact that Butte is a Superfund site has often led residents there to request that EPA move their Helena operations to Butte or to at least put a liaison there.

Some Butte residents also fear that Superfund activities will create a barrier to renewed mining. However, others feel mining should be impeded until the companies are made to comply with strict environmental standards.

4. Attitudes toward government contractors

Butte residents often express concern that Superfund cleanup and investigation activities are performed by contractors from out of state. This concern relates not only to local concern about the economy, but also to generally negative feelings some Butte residents have toward people who are not Butte or Montana natives.

5. Fear of being relocated

In 1987 and 1988, residents of the community of Mill Creek, not far from Butte, were relocated under the Superfund program. The relocation was conducted because high arsenic levels in that area cannot currently be controlled. Throughout the area around Mill Creek, including Butte, residents have expressed fear that contamination will be found at their residences and that they will also be relocated. On the other hand, a few residents who are anxious, but unable, to leave Butte have expressed interest in having the government buy their homes.

6. Lack of public education about the issues

Several interviewees said the public has received too little information about the Montana Pole site and MDHES should make an effort to raise the level of understanding. These interviewees pointed out that fact sheets, in

general, often contain too much jargon and that Superfund officials speak a different language. These people said that although most people in Butte are familiar with mining, there is not a high level of technical understanding among them.

7. Concern about children playing on the site

One interviewee pointed out that while most of the site is fenced, it can be accessed via the railroad tracks. He said that he has often seen children riding their bikes and motorcycles along Silver Bow Creek in areas that are contaminated. The same person also pointed out that people collecting baby's breath each summer climb over the fence and collect flowers on-site. He suggested that better public education and warning signs at the site might solve these problems.

COMMUNITY RELATIONS OBJECTIVES

Following is a list of MDHES and EPA objectives during RI/FS activities at the Montana Pole site:

1) Be aware of and respond to public sentiment throughout the Superfund process at the Montana Pole site. While not all concerns can be addressed or remedied, following are MDHES responses to community concerns listed above:

A) The economy

While the Superfund program cannot address the economy in Butte, MDHES and EPA employees will remain sensitive to this issue and will endeavor to respond accordingly.

B) Slowness of Superfund Activities

One way to address this issue is to continue to educate the public about the Superfund process and the many mandatory steps involved in a site remedial investigation and feasibility study. Through this method it is hoped the public will achieve a better understanding of why the process is so slow. Furthermore, the public is encouraged to become active in the reauthorization of Superfund in 1992 and talk to their legislators about changes they would like to see in the process.

C) Attitudes toward government

Whenever possible, MDHES will work closely with local government officials in Butte. MDHES will continue community outreach with the toll-free line to make Superfund employees more accessible to the public. D) Attitudes toward government contractors

Although MDHES and EPA cannot give preference to in-state contractors, it is important for Superfund employees to point out to Butte residents that many of the contractors have full-time offices and homes in Montana, although their home office may be located in another state. Furthermore, many sub-contractors on Superfund projects are based in Montana.

E) Fear of being relocated

Although relocation was the remedy chosen in Mill Creek, it will probably not be a remedy chosen in Butte, especially for the Montana Pole site.

F) Lack of public education about the issues

MDHES needs to continue to give information to the public in as many forms as possible. (Please refer to Community Relations Activities section of this plan.)

G) Children playing on the site

Better public education and community contact will help alleviate this problem.

2) Keep the lines of communication open between involved agencies and the public.

3) Make sure local governmental officials are kept up-to-date and are encouraged to be actively involved in Superfund activities at the Montana Pole site.

4) Be available, without cost, to the public and respond quickly to their questions and concerns.

5) Educate the public about the Superfund process in general and about site activities, specifically.

6) Keep the lines of communication open between MDHES and EPA, and any other involved agencies.

7) Clarify the relationships among different site activities and actions carried out under various Superfund programs by all the involved agencies.

COMMUNITY RELATIONS ACTIVITIES

The Superfund Public Information Officer (SPIO) and project personnel will refer to the most recent version of the Superfund Community Relations Handbook when necessary to supplement information in this plan. The following activities will be used in conducting community relations:

1) Press Releases

Press releases are suitable for information such as meeting announcements or smaller developments at the site. Press releases will be prepared by the SPIO and reviewed by the project manager, Superfund manager, and applicable supervisors. Press releases will be written according to Associated Press style, inverted pyramid fashion, and double-spaced. When applicable, at the end of the release will be a note to the editor requesting that meeting information be included also on the community calendar. A contact for further information will also be noted.

2) Public Service Announcements

Public service announcements (PSAs) will accompany those press releases which are sent to radio and television stations. PSAs will be used for meeting notices, workshops, the toll-free line, etc.

3) Press contact list

The SPIO will maintain, and update yearly, a Butte-area press contact list. The list will include all press contacts in the area and will note any special instructions, such as the need to put PSAs on 3 X 5 cards for certain

radio stations.

4) Press meetings

Meetings with the press are especially helpful when MDHES has a large amount of information they would like to convey to the media. These meetings can be held in the afternoon before public meetings. In these press meetings the project manager can give the reporter a brief rundown of what he or she will speak about at the public meeting. The advantages of this approach, versus no meetings or a press conference, are as follows: a) The reporter has ample opportunity to ask questions and clarify points; b) taking time with the press shows them that we are interested in them and in their accuracy; c)press conferences tend to become competitions between reporters to see who can ask the most insightful questions, so individual meetings help eliminate this and reporters who aren't as familiar with Superfund can catch up on more basic points; d) in these meetings, the Superfund personnel and the reporter have a chance for better one-on-one discussion. The Superfund personnel can get a better feeling for the reporter's attitude and understanding of Superfund and build a better working relationship with the press.

5) Superfund hotline

The MDHES Superfund in-state toll-free number, or hotline, was established in June 1987 and has proven to be an effective tool for the public as well as MDHES. The public is more hesitant to call government offices when they have to pay long-distance charges. The hotline eliminates this hesitancy. The SPIO answers hotline calls and responds to questions. Those questions he or she cannot answer are directed to the correct person, usually eliminating the phone shuffling so often encountered by the public. Calls to the hotline are monitored by the coordinator who records the date and time of the call, the question asked, the response and the time of response. Any further follow-up is also recorded. At the end of each month, the coordinator circulates a monthly hotline report to MDHES and EPA project officers so they will be informed of what types of questions the public is asking about their sites. The hotline is in operation during business hours at MDHES.

6) Update mailing lists

A mailing list is maintained for the Montana Pole site. Maintenance and updating is coordinated by SPIO and is performed by the Superfund secretaries. A record of requests to be added, dropped, or changes to be made to the mailing list will be kept by SPIO.

7) Progress reports

A variety of media can be used to keep the public informed and educated about Superfund activities. Progress reports have taken the place of the dryly named "Fact Sheets." The term "fact sheet" implies a technical report on a site while "progress report" implies a positive feeling of progression of events at the site. Progress reports follow basically the same format as fact sheets but information is broken down into smaller, more readable sections or "articles." More interesting headings are used on the sections to entice the reader. Progress reports are published periodically as events occur such as test results, completion of Superfund phases, etc.

8) Public meetings

Public meetings must be held at specified times during the Superfund process but are also effective at other milestones. Public meetings are a good way to inform the public about study findings, interesting developments, etc. SPIO will continue to try to find the most effective meeting places in Butte. SPIO will work with project managers on presentations to be given, graphics to be shown, meeting announcements, press releases and meetings, meeting room arrangements, etc.

9) One-on-one contact with the public

Although public meetings are effective, they can be impersonal for some situations. One-on-one contact such as door-to-door work is especially effective for getting access permission for sampling. One-on-one contact

should also be used for members of the public who show exceptional positive or negative interest in Superfund activities. For instance, meetings should be arranged with leaders of public interest groups such as the Clark Fork Coalition, Congressional aides, community leaders and so on.

10) Accessing for sampling efforts

When MDHES and EPA need to take samples on private property other than the Montana Pole site permission should be gained ahead of time. The community relations coordinator will contact the residents in person, explain what will be taking place, and ask the property owner to sign a permission form. The permission form, while a legal document, should be written clearly and concisely enough so the owner can read it and sign it while the coordinator waits. Furthermore, the owner should be able to feel comfortable with the permission form. The coordinator will make every effort to ensure that samplers will come only at convenient times for the owner. The coordinator will then provide copies of the permission forms, resident contact sheets, any necessary maps, and special instructions or requests to the personnel doing the sampling.

11) Public education

Because Superfund is such a complex program, more effort should be made to educate the public as to what it is and how it works. The public often expresses frustration over the amount of time Superfund activities take and the number of studies necessary before cleanup begins. Some of these feelings could be assuaged with better public education. Furthermore, much of the public has little concept of what hazardous wastes are and how to protect themselves from them. An effective route for public education would be through the public schools at the junior high and high school levels. Several science teachers and administrators in Montana have expressed an interest in incorporating Superfund in their curriculums. MDHES could schedule a series of evening or weekend workshops for teachers and other interested citizens in Montana to educate them about Superfund in general and specifically about the sites.

12) Small group meetings

Informal small group meetings will be held when SPIO and project managers need to update smaller groups of citizens. This kind of meeting provides the members with a better opportunity to ask questions and voice concerns than a large public meeting. Small group meetings can also be used to meet with Congressional aides, local government officials, etc.

13) Prepare other documents as necessary

Other various documents are required by Superfund law such as responsiveness summaries and proposed plans. These documents will be prepared by MDHES and EPA as required by law.

14) Continue on-going training for SPIO and project personnel

The SPIO and project personnel will continue to keep themselves educated on community relations especially as legal requirements and guidance change. This on-going training will be provided as funds and training are available. Some training of project officers may be performed by the SPIO.

15) Maintain a central public information contact

The SPIO is the first-line contact person with the public in most cases. Questions and concerns which SPIO cannot respond to, will be turned over to the appropriate person.

16) Maintain an information repository and administrative record

An information repository and administrative record will be maintained at a location in Butte accessible to, and convenient for the public. New public documents will be added to the repository/administrative record as they are released. The administrative record previously compiled for the EPA emergency removal activities also will be included in the repository.

APPENDIX A

CONTACT LIST, PRESS LIST,

AND REPOSITORIES

MONTANA POLE SUPERFUND SITE

CONTACT LIST

Montana Department of Health and Environmental Sciences

Director's office
Superfund manager
Karen Zackheim, state project manager
Janie Stiles, Superfund public information officer
Room B201, Cogswell Building
Helena, Montana 59620
406-444-2821 or 1-800-648-8465

EPA, Helena Office

John Wardell, director
Eric Finke, Superfund manager
Charles Coleman, remedial project manager
U.S. EPA
Federal Building, Drawer 10096
301 South Park
Helena, MT 59626

Congressional Contacts

Senator Max Baucus
Attn: Kim Krueger
125 West Granite
Silver Bow Center
Butte, MT 59701

Senator Max Baucus
Attn: Ron Cooper
706 Hart Office Building
Washington, D.C. 20515

Senator Conrad Burns
Attn: Dennis Rehberg
P.O. Box 3311
Billings, MT 59101

Senator Conrad Burns
Senate Hart Office Building
Room 825A
Washington, D.C. 20510

Representative Pat Williams
Attn: David Blair
302 West Broadway
Missoula, MT 59806

Representative Pat Williams
Attn: Jim Foley
2475 Rayburn Building
Washington, D.C. 20515

Local Politicians

Rep. Dave Brown
3040 Ottawa
Butte, MT 59701

Rep. Fritz Daily
1057 West Steel
Butte, MT 59701

Rep. Dan Harrington
1201 N. Excelsior
Butte, MT 59701

Rep. Bob Pavlovich
1375 Harrison Ave.
Butte, MT 59701

Rep. Joe Quilici
3040 Kossuh
Butte, MT 59701

Sen. Judy Jacobson
330 Blacktail Canyon Road
Butte, MT 59701

Sen. Larry Stimatz
1615 C. Street
Butte, MT 59701

Sen. J.D. Lynch
532 West Mercury
Butte, MT 59701

Butte Local Officials

Chief Executive Don Peoples
Butte-Silver Bow Courthouse
Butte, MT 59701

Butte-Silver Bow Health Dept.
Attn: Dan Dennehey
Civic Center Road
Butte, MT 59701

Butte area press contacts

Montana Standard Newspaper
Attn: Eric Williams and Jim Tracy
P.O. Box 627
Butte, MT 59703

KBOW and KOPR Radio
Box 3389
Butte, MT 59702

KQUY and KXTL Radio
Attn: Bob Roberts
3219 Harrison
Butte, MT 59701

KUFM Radio
Attn: Sally Mauk
University of Montana
Missoula, MT 59812

KTVM TV
Attn: Tim Ledbetter
P.O. Box 3118
Butte, MT 59701

KXLF TV
Attn: Viola Vigil
P.O. Box 3500
Butte, MT 59702

Repositories

Library
Montana Tech
Butte, MT 59701

Montana State Library
Capitol Station
Helena, MT 59620

APPENDIX B

SUMMARY OF LEGAL REQUIREMENTS GOVERNING DEVELOPMENT OF THE COMMUNITY RELATIONS PLAN

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9601-9675 (amended 1986) to correct the nationwide public health, welfare and environmental problems caused by improperly managed hazardous substances. The United States Environmental Protection Agency (EPA) has been delegated the authority to issue regulations to "establish procedures and standards for responding to releases of hazardous substances" and to assign "appropriate roles and responsibilities for ... government."

The standards for governmental response under CERCLA are given detail and structure by the "National Oil and Hazardous Substances Pollution Contingency Plan" (NCP), 40 C.F.R. part 300, which functions as the road map for performing the necessary investigatory, analytical, and design activities to ensure that the cleanup of hazardous substances at a site is protective of public health, welfare an the environment and is cost effective.

Both CERCLA and the NCP recognize community relations as an important element in every site cleanup program. Specifically, the NCP (Section 300.67 (a)) requires the lead agency to develop and implement a formal community relations plan for response actions taken pursuant to CERCLA. CERCLA, as recently amended, augments the NCP community relations requirements by establishing mandatory public participation requirements which must be met by governmental entities involved in cleanup activities. 42 U.S.C. § 9617. This plan was prepared in accordance with, and is consistent with CERCLA, the NCP, and all pertinent EPA guidance. This plan will be revised as necessary, to comply with any statutory or regulatory requirements.

APPENDIX C

SAMPLE ACCESS FORMS AND INFORMATION

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES

TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

PERMISSION FOR ACCESS TO PROPERTY

I, the undersigned, am the owner, his representative, or otherwise control the real property at the location described below. Representatives of the Montana Department of Health and Environmental Sciences have informed me that elevated levels of heavy metals concentrations may be present at this location, and that they may be injurious to the health of persons residing on or near this property. I also understand that further investigative efforts are needed to describe the source of this contamination and define its extent in this vicinity.

I hereby give permission to Montana Department of Health and Environmental Sciences and their contractors and subcontractors, as well as their employees, agents and other designated representatives (who may include state and local agencies and their officials), to have access to my property and to undertake such investigations, monitoring, surveying, testing and other information-gathering as may be necessary.

Activities will consist of soil sampling.

I understand that the work described above may involve, among other things, disturbance of vegetation and the top few inches of soil on my property. I also understand that any disturbed vegetation will be restored to substantially the same condition as existed prior to such disturbance.

Property Address:

Signature of Owner/Occupant (all joint owners and tenants must sign):

_____ _____

(Signature) (Date)

_____ _____

(Signature) (Date)

_____ _____

(Signature) (Date)

RESIDENT CONTACT SHEET

RESIDENT NAME _____

ADDRESS _____ TELEPHONE _____

DATE _____ TIME _____ TYPE OF CONTACT* _____

REMARKS

_____
SPM or DESIGNATE

* T=Telephone; L=Letter; IP=In Person

DATE_____
DAY_____

APPOINTMENT NOTEBOOK
(Sample Page)

TIME	ADDRESS	RESIDENT	TYPE OF WORK	SUPERFUND PERSONNEL	SPM or DESIGNATE
8 A.M.					
9					
10					
11					
12 P.M.					
1					
2					
3					
4					
5					
6					
7					

APPENDIX D

SAMPLE PRESS RELEASE

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES

TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

HELENA, MONTANA 59620

Solid & Hazardous Waste Bureau
(406) 444-2821

June 1, 1988

FOR IMMEDIATE RELEASE

DOWNSTREAM SCREENING STUDY TO BEGIN AT MILLTOWN SUPERFUND SITE

HELENA -- The Montana Department of Health and Environmental Sciences (MDHES) has contracted with environmental consulting firm Camp, Dresser and McKee to conduct a downstream screening study on the Clark Fork River as part of Milltown Superfund site activities.

"The study will be part of the Remedial Investigation/Feasibility Study for the Milltown Superfund toxic waste cleanup site," State project manager Philip Hertzog said, and added, "the downstream screening study will be an investigation of the Clark Fork River from the Milltown Dam downstream to the confluence of the Bitterroot River, about 12.4 river miles."

The studies will consist of sampling and analysis of river water and sediments, in addition to wells in that area. Sampling will begin this summer, Hertzog said.

Wastes containing heavy metals have washed down the Clark Fork River from 100 years of mining in the basin. The wastes have accumulated in sediments behind the Milltown Dam which is located at the confluence of the Clark Fork and Blackfoot rivers, five miles east of Missoula. The study results will help

MDHES and U.S. Environmental Protection Agency assess whether these contaminated sediments have gone past the dam and down the Clark Fork River.

Camp, Dresser and McKee has also been contracted to develop a work plan to finish the Remedial Investigation/Feasibility Study for the site. This project entails defining the problem and developing cleanup alternatives. The potentially responsible parties for the site will be given an opportunity to conduct the work. If the responsible parties refuse, Camp, Dresser, and McKee will complete the study.

In May, 1981, MDHES officials discovered four community water wells in Milltown contaminated with arsenic at levels up to 20 times the maximum allowable contaminant level. The Milltown Reservoir sediments were identified as the source of the well contamination. MDHES constructed an alternative municipal water supply for the affected area in the town of Milltown/Bonner.

For more information, please contact State Superfund information officer Janie Stiles 444-2970 or 1-800-648-8465 or EPA project manager Ken Wallace 44-5414.

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